

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

PRESTON TILGER, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

BENEFITS PARTNER, LLC d/b/a
SALUS GROUP,

Defendant.

Case No. 2:25-cv-11108-LVP-APP

JANINE OROSCO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BENEFITS PARTNER, LLC d/b/a
SALUS GROUP,

Defendant.

Case No. 2:25-cv-11204-SKD-EAS

ARTHUR WAGNER, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

BENEFITS PARTNER, LLC d/b/a
SALUS GROUP,

Defendant.

Case No. 2:25-cv-11219-MAG-DRG

JOHN STACHO, individually and on behalf of all others similarly situated, Plaintiff, v. BENEFITS PARTNER, LLC d/b/a SALUS GROUP, Defendant.	Case No. 2:25-cv-11353-MFL-KGA
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**ORDER GRANTING STIPULATION TO
CONSOLIDATE CASES AND APPOINT CLASS COUNSEL**

This matter is before the Court on the Parties’ Stipulation to Consolidate Cases and Appoint Class Counsel.

For the reasons set forth in that stipulation, Plaintiff Tilger’s prior motion to consolidate, and as discussed during the May 29, 2025 conference with the Court, and to ensure consistent and efficient adjudications in this Court, and for other good cause shown, the Court hereby **GRANTS** the stipulation to consolidate and to appoint interim class counsel, and issues the following orders:

A. Consolidation of Related Actions

1. The following Related Actions are hereby consolidated for all pre-trial proceedings (the “Consolidated Action”): (1) *Preston Tilger v. Benefits Partner, LLC d/b/a Salus Group*, Case No. 2:25-cv-11108-LVP-APP; (2) *Janine Orosco v. Benefits Partner, LLC d/b/a Salus Group*, Case No. 2:25-cv-11204-SKD-EAS; (3)

Arthur Wagner v. Benefits Partner, LLC d/b/a Salus Group, Case No. 2:25-cv-11219-MAG-DRG; and (4) *John Stacho v. Benefits Partner, LLC d/b/a Salus Group*, No. 2:25-cv-11353-MFL-KGA.

2. *Preston Tilger v. Benefits Partner, LLC d/b/a Salus Group*, Case No. 2:25-cv-11108-LVP-APP, shall be designated as the lead action, with all pleadings in the Consolidated Action to bear the caption *In re Benefits Partner, LLC d/b/a Salus Group Litigation*, Case No. 2:25-cv-11108-LVP-APP.

3. *Janine Orosco v. Benefits Partner, LLC d/b/a Salus Group*, Case No. 2:25-cv-11204-SKD-EAS; *Arthur Wagner v. Benefits Partner, LLC d/b/a Salus Group*, Case No. 2:25-cv-11219-MAG-DRG; and *John Stacho v. Benefits Partner, LLC d/b/a Salus Group*, No. 2:25-cv-11353-MFL-KGA shall be administratively closed and the files of the Consolidated Action shall be maintained in one file under Master File No. Case No. 2:25-cv-11108-LVP-APP.

4. Should a case that arises out of the same subject matter of the Consolidated Action subsequently be filed in this Court or transferred from another Court, a motion may be made to consolidate it as well. Nothing in foregoing shall be construed as a waiver of Defendant's right to object to consolidation of any subsequently filed or transferred related action;

5. Pursuant to Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure, service by e-mail transmission shall be permitted in addition to service via ECF notification.

6. Plaintiffs will file a consolidated class action complaint by June 12, 2025.

7. Within 30 days of the filing of a consolidated class action complaint, the parties shall meet and confer on Defendant's response thereto and submit a proposed schedule to the Court.

8. Defendant shall not be required to answer or otherwise respond to any of the original complaints in the Related Actions.

9. Additionally, the Court appoints Raina C. Borrelli of Strauss Borrelli PLLC as Interim Class Counsel. Interim Class Counsel, during all phases of this litigation, shall have the following responsibilities, duties, and sole authority to:

- a) Coordinating the work of preparing and presenting all of Plaintiffs' claims and otherwise coordinating all proceedings, including organizing and supervising the efforts of Plaintiffs' counsel in a manner to ensure that Plaintiffs' pretrial preparation is conducted effectively, efficiently, expeditiously, and economically;
- b) Delegating work responsibilities and monitoring the activities of all Plaintiffs' counsel in a manner to promote the orderly and efficient conduct of this litigation and to avoid unnecessary duplication and expense;
- c) Calling meetings of Plaintiffs' counsel for any appropriate purpose, including coordinating responses to questions of other parties or of the Court, and initiating proposals, suggestions, schedules, and any other appropriate matters;

- d) Determining (after consultation with other co-counsel as may be appropriate) and presenting (in briefs, oral argument, or such other fashion as his or her designee may deem appropriate) to the Court and opposing parties the position of the Plaintiffs on all matters arising during pretrial (and, if appropriate, trial) proceedings;
- e) Serving as the primary contact for all communications between Plaintiffs and Defendant, and acting as spokespersons for all Plaintiffs vis-à-vis Defendant and the Court;
- f) Directing and executing on behalf of Plaintiffs the filing of pleadings and other documents with the Court;
- g) Appearing at all court hearings and conferences regarding the case as most appropriate for effective and efficient representation, and speaking for Plaintiffs at all such hearings and conferences;
- h) Receiving and initiating communication with the Court and the Clerk of the Court (including receiving orders, notices, correspondence, and telephone calls) and dispensing the content of such communications among Plaintiffs' counsel;
- i) Initiating and conducting discussions and negotiations with counsel for Defendant on all matters, including settlement;
- j) Negotiating and entering into stipulations with opposing counsel as necessary for the conduct of the litigation;
- k) Initiating, coordinating, and conducting all discovery on Plaintiffs' behalf and ensuring its efficiency;
- l) Selecting, consulting with, and employing experts for Plaintiffs, as necessary;
- m) Encouraging and enforcing efficiency among all Plaintiffs' counsel;
- n) Assessing Plaintiffs' counsel for the costs of the litigation;
- o) Preparing and distributing periodic status reports to the Court and to the parties as ordered;
- p) Developing and recommending for Court approval practices and procedures pertaining to attorneys' fees and expenses as further detailed below and, on an ongoing basis, monitoring and administering such procedures. At such time as may be appropriate,

Interim Class Counsel also will recommend apportionment and allocation of fees and expenses subject to Court approval; and,

- q) Performing such other duties as are necessary in connection with the prosecution of this litigation or as may be further directed by the Court.

10. It is the Court's intent that, as to all matters common to these coordinated cases, and to the fullest extent consistent with the independent fiduciary obligations owed by any and all Plaintiffs' counsel to their clients and any putative class, pretrial proceedings shall be conducted by and through Interim Class Counsel.

11. This Order applies to all actions included in the above-captioned consolidated matters and all subsequently consolidated actions.

IT IS SO ORDERED.

s/ Linda V. Parker
LINDA V. PARKER
U.S. DISTRICT JUDGE

Dated: June 3, 2025